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DISTRICT OF UTAH

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,	:	INDICTMENT
	:	
Plaintiff,	:	VIO. 18 U.S.C. § 1344
	:	[Bank Fraud]
vs.	:	
	:	18 U.S.C. §1028A
	:	[Aggravated Identity Theft]
KRISTIN KAY ROMNEY,	:	
	:	18 U.S.C. § 1708
Defendant.	:	[Possession of a Stolen Mail]

The Grand Jury charges:

Case: 2:10-cr-00347
Assigned To : Kimball, Dale A.
Assign. Date : 4/28/2010
Description: USA v.

COUNTS 1-11
[Bank Fraud]

1) On or about the dates listed below, in the Central Division of the District of
Utah,

KRISTIN KAY ROMNEY,

the defendant herein, did knowingly devise a scheme and artifice to defraud the financial institutions referenced below, and did obtain moneys, funds, credits, or other properties owned by or under the custody and control of the financial institutions named below, by means of false and fraudulent pretenses, representations and promises, in that defendant submitted fraudulent checks to various credit unions, and banks all of which were qualifying financial institutions as defined by 18 U.S.C. § 20 and whose deposits were, at all times material to this indictment, insured by the National Credit Union Share Insurance Fund and the Federal Deposit Insurance Corporation.

2) In execution of the scheme and artifice to defraud and to obtain moneys, funds, credit and properties under control of the financial institution by false and fraudulent pretenses and promises, the defendant did the following; the defendant, acting alone or with others unknown to the Grand Jury, obtained identifying information that had been in the mail of other individuals, thereafter used the information to create fraudulent checks associated with the identifying information and financial institutions of others, and from there presented the checks in an effort to negotiate or deposit the checks. By engaging in this scheme, defendant falsely represented to each financial institution that she had authority to access to the checks and accounts of the account holders when she did not. In the course of this scheme, defendant, by feigning to be the account holders listed below, did effect transactions in the amounts listed below with the financial institutions named

below:

Ct.	Dates	Fin. Inst.	Check Number	Check Amt.	Acct. Holder
1	1/4/10	Cyprus CU	#1102	\$83.32	C.S.
2	1/4/10	Cyprus CU	#1099	\$50.12	C.S.
3 ✓	1/4/10	Cyprus C.U.	#1103	\$134.32	C.S.
4	1/4/10	Cyprus C.U.	#1098	\$779.98	C.S.
5	1/4/10	Cyprus C.U.	#1101	\$205.77	C.S.
6	1/24/10	Key Bank	#5588	\$69.72	R.B.
7	1/24/10	Key Bank	#5599	\$378.93	R.B.
8	1/25/10	Key Bank	#5600	\$470.83	R.B.
9	1/25/10	Key Bank	#5598	\$343.44	R.B.
10	1/25/10	Key Bank	#5607	\$403.06	R.B.
11	1/25/10	Key Bank	#5605	\$26.39	R.B.

and did attempt to do so, all in violation of 18 U.S.C. § 1344 and punishable thereunder.

COUNT 12

18 U.S.C. § 1028A(a)
[Aggravated Identity Theft]

On or about January 25, 2010, in the Central Division of the District of Utah,

KRISTIN KAY ROMNEY,

the defendant herein, did, without lawful authority, knowingly possess and use a means of identification of another person, to wit, the Key Bank account belonging to R.B. a real individual, during and in relation to a felony violation enumerated in 18 U.S.C. §

1028A(c), to wit, bank fraud in violation of 18 U.S.C. § 1344 as alleged in Count 4 which Count is incorporated herein by reference; all in violation of 18 U.S.C. § 1028A(a)(1) and punishable thereunder.

COUNT 13
18 U.S.C. § 1708
(Possession of Stolen Mail Matter)

On or about January 6, 2010, in the Central Division of the District of Utah,

KRISTIN KAY ROMNEY,

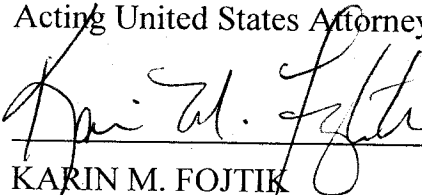
defendant herein, did unlawfully have in her possession a mail addressed to V.W. which had been stolen, taken, and abstracted from a letterbox in Salt Lake County, Utah, which was an authorized depository for mail matter, knowing the letters and mail to have been stolen, taken, and abstracted from an authorized depository of mail matter, all in violation of 18 U.S.C. § 1708.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

CARLIE CHRISTENSEN
Acting United States Attorney



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